

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)
)
)
Plaintiff,)
)
)
v.) No. 07 CR 851
) Judge Sidney I. Shenkier
FRANCISCO MENDEZ-NUNEZ, et al.,)
(FRANCISCO SOTO))
)
)
Defendant.)

**DEFENDANT SOTO'S AGREED MOTION TO
MODIFY THE CONDITIONS OF PRETRIAL RELEASE**

Defendant, **FRANCISCO SOTO**, by and through his attorney, **PATRICK W.**

BLEGEN, pursuant to 18 U.S.C. §3142(c) and §3145(a)(2), respectfully requests that the Court enter its order modifying the conditions of his pretrial release by extending the .

1. On December 20, 2007, Defendant was arrested by agents of the Drug Enforcement Administration. On December 27, 2007, Defendant was released on a recognizance bond, with home incarceration, electronic monitoring, and work release as conditions of his bond.

2. The work release condition permitted Defendant to be out of his home for purposes of employment from 7:00 am to 5:30 pm.

3. Since the time of his release, Defendant has been working full-time, and his employer has recently offered him the opportunity to work additional hours.

4. Defendant requests, therefore, that his work release condition be extended so that he is permitted to be outside of his home for work purposes from 7:00 am to 7:00 pm.

5. Counsel has spoken with attorney for the government, Assistant United States

Attorney Greg Deis, who has indicated that counsel may represent to the Court that the government has no objection to the granting of this motion.

6. Counsel has also spoken with Defendant's Pre-Trial Services Officer Pace Morrison, who likewise indicated that counsel could represent to the Court that he has no objection to the modification of Defendant's bond requested herein.

WHEREFORE, Defendant respectfully requests that this Court enter its order modifying his pretrial release so as to extend his work release to 7:00 pm.

Respectfully submitted,

s/Patrick W. Blegen
PATRICK W. BLEGEN, Attorney for
Defendant, Francisco Soto.

BLEGEN & GARVEY
53 West Jackson Boulevard, Suite 1437
Chicago, Illinois 60604
(312) 957-0100

CERTIFICATE OF SERVICE

I hereby certify that foregoing Defendant's Agreed Motion to Modify the Condition of Pretrial Release was served on February 13, 2008, in accordance with Fed.R.Crim.P.49, Fed.R.Civ.P.5, LR 5.5, and the General Order on Electronic Case Filing (ECF) pursuant to the district court's system as to ECF filers.

s/ Patrick W. Blegen
PATRICK W. BLEGEN

53 West Jackson Boulevard, Suite 1362
Chicago, Illinois 60604
(312) 957-0100